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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

6:19-cv-00707-BR

Plaintiff,

v.

**MOTION TO LIFT STAY AND
FOR ENTRY OF A DEFAULT
JUDGMENT OF FORFEITURE**

**\$2,457,790.72 in Funds seized from
JPMorgan Chase Bank account
#xxx0905;
\$1,266,650.00 in Funds seized from
JPMorgan Chase Bank account
#xxx3511;
\$1,383.68 in Funds seized from
JPMorgan Chase Bank account
#xxx2125; \$200,653.71 in Funds seized
from
JPMorgan Chase Bank account
#xxx8881;
\$32,921.00 US Currency;
\$1,940.77 US Currency;
31.53810677 BTC;
1,022.39066800 ETH; and
5.74017141 BCH;
*in rem,***

Defendants.

The United States of America, by Billy J. Williams, United States Attorney, and Assistant
United States Attorney Amy E. Potter, hereby requests that this Court lift the stay previously

Motion to Lift Stay and for Entry of a Default Judgment of Forfeiture

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ordered in this case. The parallel criminal case (6:19-cr-00504-AA) has been resolved as to the Claimant, and the justification for the stay is no longer at issue.

Further, pursuant to Rule 55, Fed. R. Civ. P., and Rule G(5), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and the records and files in this action, moves this Court for entry of a default judgment of forfeiture against defendants, *in rem*, **\$2,457,790.72 in Funds seized from JPMorgan Chase Bank account #xxx0905; \$1,266,650.00 in Funds seized from JPMorgan Chase Bank account #xxx3511; \$1,383.68 in Funds seized from JPMorgan Chase Bank account #xxx2125; \$200,653.71 in Funds seized from JPMorgan Chase Bank account #xxx8881; \$32,921.00 US Currency; \$1,940.77 US Currency; 31.53810677 BTC; 1,022.39066800 ETH; and 5.74017141 BCH;** and all persons claiming any right, title, or interest in or to these defendants for failure to plead, claim, answer, or otherwise defend this action after proper notice in this civil *in rem* forfeiture action was given by the United States of America.

This motion is supported by the Declaration of Assistant United States Attorney Amy E. Potter filed herewith pursuant to Rule 55, Fed. R. Civ. P., and L.R. 1030.

DATED: **December 19, 2019.**

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney